

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC

By: Mary F. Kennedy, Esquire

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Kenneth Cooper

Debtor(s)

Chapter 13 Proceeding

17-16828 ELF

**STIPULATION BY AND BETWEEN KENNETH COOPER AND NATIONWIDE  
ASSETS, LLC**

WHEREAS, on October 6, 2017 Kenneth Copper (hereinafter “Debtor”) filed the above referenced bankruptcy petition;

WHEREAS, on January 4, 2018 Nationwide Assets, LLC filed a Proof of Claim (Claim No. 4);

WHEREAS, Nationwide Assets, LLC’s Claim is based on a second Mortgage and Note executed by the Debtor on March 13, 1998. The mortgage gives Nationwide Assets, LLC a security interest in the Debtor’s property located at 6126 Old York Road, Philadelphia, PA 19141 hereinafter “the property”);

WHEREAS, on March 1, 2018 Debtor and Nationwide Assets, LLC entered into a Stipulation for the payment of Nationwide Assets, LLC’s pre-petition arrears claim;

WHEREAS, Debtor has been performing under the terms of the Stipulation;

WHEREAS, prior to the filing of this Bankruptcy petition Nationwide Assets, LLC filed a mortgage foreclosure action on the Philadelphia Court of Common Pleas (September 2017 No. 000444);

WHEREAS, Nationwide Assets, LLC wishes to dismiss the foreclosure action;


WHEREAS, the Philadelphia Countu Court of Common Pleas will not dismiss the foreclosure action until the automatic stay is lifted; and

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:


1. Upon approval by the United States Bankruptcy Court of the within Stipulation, Debtor and Nationwide Assets, LLC, agree to the following
2. The parties agree that the automatic stay shall be vacated for the sole purpose of allowing Nationwide Assets, LLC to request dismissal of the mortgage foreclosure action (September 2017 No. 000444).

3. The parties agree that a facsimile may be submitted to the Court as if it were an original.

STIPULATED AND AGREED TO BY:

  
John L. McClain, Esquire  
Attorney for Debtor, Kenneth Cooper

Date: 3-6-2020

  
Mary F. Kennedy, Esquire  
Attorney for Nationwide Assts, LLC

Date: 3/6/2020

On this \_\_\_\_ day of \_\_\_\_\_, 2020, approved by the Court.

\_\_\_\_\_  
United States Bankruptcy Judge  
Eric L. Frank